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January 27, 2021

VIA CM / ECF

Judge Lewis J. Liman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Eastern Profit Corp. Ltd. v. Strategic Vision US LLC*, C.A. No. 18-cv-2185 (LJL)

Dear Judge Liman:

We write regarding the Court's order of January 10, 2021, continuing the bench trial set for January 19, 2021 and denying Eastern's request that the trial proceed remotely pursuant to Rule 43(a) and Standing Order M-10-468. Specifically, we write regarding the portion of the Court's order directing the parties to be ready for trial in person on 48 hours' notice any date after February 12, 2021.

As the Court is aware, Eastern wanted to proceed with the trial scheduled for November 9, 2020 (which was continued after Strategic's request for an in person trial) and again with the trial scheduled for January 19, 2021 (which also was continued after Strategic's request for an in person trial). Eastern had prepared for the January 19, 2021 trial date, and now given the passage of time, will need to do so again in advance of the next trial date.

Having no date certain and the possibility of being called to trial on 48 hours' notice puts Eastern in the position of having to incur the cost and time to prepare for trial again, only to have the date continued again, which we believe is a significant risk given the state of the pandemic. In addition, Eastern's witnesses would have to forego scheduling any commitments for an uncertain time period. Moreover, counsel for Eastern previously scheduled other case obligations around the timing of the scheduled January 19, 2021 trial, including several depositions in February for a case in the Eastern District of Pennsylvania in which discovery closes in March (on dates that already have been consented to by witnesses, in house counsel, and the opposing party).

To avoid further prejudice to Eastern, Eastern respectfully requests—to the extent possible given the availability of courtrooms—that the Court set a firm trial date at a time in March when hopefully the chances of the Standing Order being extended are further reduced.

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We have consulted with counsel for Strategic and are authorized to report that they do not object to this request, as, under the State of New York's current COVID rules, Strategic's counsel and witnesses will need a few weeks' advance notice to make special reservations for rapid tests in their home jurisdiction; travel; quarantine; and rapid tests in New York.

Respectfully,

/s/ Joanna J. Cline

Joanna J. Cline

cc: All Counsel of Record (By CM/ECF)

A trial date of April 19, 2021 is set for the bench trial in this action.

SO ORDERED. 1/28/2021.

A handwritten signature in black ink, appearing to read "L. Liman".

LEWIS J. LIMAN
United States District Judge